No. 80-795

IN THE SUPREME COURT OF THE UNITED STATES

October Term, 1980

MICHAEL HEFFRON, etc., et al.,

Petitioners,

vs.

INTERNATIONAL SOCIETY FOR KRISHNA CONSCIOUSNESS, INC., et al.,

Respondents.

On Writ of Certiorari to the Supreme Court of the State of Minnesota

---

AMICUS CURIAE BRIEF FOR COUNTY OF LOS ANGELES

JOHN H. LARSON
County Counsel

DeWITT W. CLINTON
Chief, Division of Special Services

MARY F. WAWRO
Deputy County Counsel

648 Hall of Administration
Los Angeles, California 90012
(213) 974-1933

Amicus Curiae
County of Los Angeles

No. 80-795
IN THE SUPREME COURT OF THE UNITED STATES

October Term, 1980

MICHAEL HEFFRON, etc., et al.,

Petitioners,

vs.

INTERNATIONAL SOCIETY FOR KRISHNA CONSCIOUSNESS, INC., et al.,

Respondents.

On Writ of Certiorari to the Supreme Court of the State of Minnesota

---

AMICUS CURIAE BRIEF FOR COUNTY OF LOS ANGELES

JOHN H. LARSON
County Counsel

DeWITT W. CLINTON
Chief, Division of Special Services

MARY F. WAWRO
Deputy County Counsel

648 Hall of Administration
Los Angeles, California 90012
(213) 974-1933

Amicus Curiae
County of Los Angeles

TOPICAL INDEX

	Page
Table of Authorities	ii
INTRODUCTION	1
QUESTION PRESENTED	8
SUMMARY OF ARGUMENT	8
ARGUMENT	9
I COMMERCIAL SALES TRANSACTIONS WHICH INCLUDE HABITUAL FRAUDULENT CONDUCT ARE NOT ENTITLED TO A HIGH DEGREE OF FIRST AMENDMENT PROTECTION MERELY BECAUSE THE TRANSACTIONS ARE CLAIMED TO BE A RELIGIOUS RITUAL.	9
II AS ACTIVITIES MOVE FROM THE REALM OF PURE SPEECH OR PURE BELIEF TO THE REALM OF COMMERCIAL AND FRAUDULENT TRANSACTIONS, THE DEGREE OF GOVERNMENTAL INTEREST WHICH MUST BE SHOWN TO VALIDATE THE REGULATION SHOULD SIMULTANEOUSLY DECREASE.	18
CONCLUSION	20

TABLE OF AUTHORITIES

Cases	Page
Grayned v. City of Rochford, 408 U.S. 104 (1972)	19
ISKCON v. Barber, 77 CV 328 (August 25, 1980 N.D.N.Y.)	3, 12, 14 15, 16
ISKCON v. Conlisk, 374 F.Supp. 1010 (E.D. Ill. 1973)	20
ISKCON v. County of Los Angeles, 112 Cal. App. 3d 582 (1980)	3, 4, 6 7, 14
ISKCON v. Eaves, 601 F.2d 809 (5th Cir. 1979)	18
ISKCON v. Heffron, 299 N.W.2d 79 (1980)	18, 20
ISKCON v. Kearnes, 454 F.Supp. 116 (E.D. Cal. 1978)	16, 17
Murdock v. Pennsylvania, 319 U.S. 105 (1943)	6, 9, 10 11, 12, 20
Schneider v. State, 308 U.S. 147 (1939)	19

United States v. O'Brien,
391 U.S. 367 (1968) 20

Constitutions

United States Constitution,
First Amendment 1, 2, 3, 4, 8
9, 12, 16, 18, 20

California Constitution,
Article XIII, Section 4(b) 4

Statute

California Revenue and Taxation Code,
Section 214 4

No. 80-795

IN THE
SUPREME COURT
OF THE UNITED STATES
October Term, 1980

MICHAEL HEFFRON, etc., et al.,

Petitioners,

vs.

INTERNATIONAL SOCIETY FOR
KRISHNA CONSCIOUSNESS, INC., et al.,

Respondents.

AMICUS CURIAE BRIEF
FOR COUNTY OF LOS ANGELES

INTRODUCTION

The County of Los Angeles has a strong interest in this Court's determination of the degree of First Amendment protection which shall be accorded to interrelated activities of a religious group when those activities have free speech, religious and commercial aspects.

From the earliest history of this nation, it has been recognized that certain fundamental

liberties must be accorded unparalled protection from governmental interference. Among these are the right of free speech and free exercise of religion which are enshrined in the First Amendment. At the same time, however, it has been universally understood that such human activity exists on a continuum moving from the realm of pure speech or religious belief into the area of conduct which impinges to an ever increasing degree upon the lives and rights of other persons.

Thus, no one may contend that government can regulate in any way the private religious belief of any citizen no matter how bizarre or offensive it might appear to all others. Similarly, the right to communicate ideas to others is of paramount importance in the scheme of the First Amendment and is carefully guarded. Nevertheless, this Court has recognized that in certain instances, governmental regulation as to the time, place, and manner of such communication will be permitted upon a sufficient showing of government interest in such regulation.

In striking the proper balance this Court has weighed a number of factors: the nature of the First Amendment activity sought to be protected; whether it comprises pure speech, personal belief, or acts which impinge on the rights of other individuals or society generally; the nature of the governmental interest sought to be advanced; whether the governmental interference is prohibitory or merely regulatory; whether content of the First Amendment activity is sought to be controlled and whether a less restrictive means of regulation can accomplish an admittedly legitimate governmental purpose. As As the continuum of First Amendment activities moves away from pure speech, a decreasingly

strict level of scrutiny has been applied in order to validate the particular governmental activity under challenge.

During the past decade, the International Society for Krishna Consciousness [ISKCON] has repeatedly challenged various statutes and local ordinances which regulate the time, place, and manner in which First Amendment activites can be exercised. The basis for these challenges has traditionally been that the regulation directly limits ISKCON's practice of Sankirtan, its purportedly reglious ritual. In virtually every case, the posture of the litigation has been that the local government has stipulated for all purposes that Sankirtan in fact is a religious ritual thereby increasing considerably the burden the state must carry in order to uphold the validity of the regulation. Although the courts have uniformly noted certain problems in viewing Sankirtan as a purely religious ritual, they have observed that they were limited by the factual stipulations of the parties as to the religious nature of Sankirtan.

In apparently only a very few cases has there been a full trial on the merits in which the question of whether all aspects of Sankirtan validly constitute a religious ritual which is entitled to the highest caliber of First Amendment protection. ISKCON v. Barber, 77 CV (August 25, 1980 N.D.N.Y.), and ISKCON v. County of Los Angeles, 1/ 112 Cal. App. 3d

---

1/ A petition for hearing by the California Supreme Court has been filed by ISKCON. By order of that Court the time for granting or denying that petition has been extended to March 23, 1981.

582 (1980).

In both of these cases, the Courts focused on the commercial aspects of certain Sankirtan activities. Similarly, the thoughtful dissent in the case at bench provided a balanced approach for a determination as to whether all aspects of Sankirtan should be swept under the umbrella of the First Amendment.

Although the Los Angeles case does not turn on First Amendment issues, the underlying question of prime importance here as well as in California is the same -- what activities of a religious group may be controlled to some degree by governmental regulation and what activities are completely protected from all interference.

In ISKCON v. County of Los Angeles, supra, the Society sued for a refund of taxes which had been assessed on certain real property it owns within the County, claiming that the property should rightfully be exempt from tax under California's Welfare Exemption, California Revenue and Taxation Code §214; California Constitution Article XIII, Section 4(b).[2/] The

---

2/ Section 214 provides in part:

"214. Property used exclusively for religious, hospital, scientific, or charitable purposes owned and operated by community chests, funds, foundations or corporations

(continued on p. 5)

property was used for ISKCON's book publishing and sales activities and to house approximately

---

2/ Continued from p. 4)
organized and operated for religious, hospital, scientific, or charitable purposes is exempt from taxation if:

"(1) The owner is not organized or operated for profit, provided, that in the case of hospitals, such organization shall not be deemed to be organized or operated for profit, if during the immediate preceding fiscal year the excess of operating revenues, exclusive of gifts, endowments and grants-in-aid, over operating expenses shall not have exceeded a sum equivalent to 10 percent of such operating expenses. As used herein, operating expenses shall include depreciation based on cost of replacement and amortization of, and interest on, indebtedness:

"(2) No part of the net earnings of the owner inures to the benefit of any private shareholder or individual;

"(3) The property is used for the actual operation of the exempt activity and does not exceed an amount of property reasonably necessary to the accomplishment of the exempt purpose;

"(4) The property is not used or operated by the owner or by any other person so as to benefit any officer, trustee, director, shareholder, member, employee, contributor, or bondholder of the owner or operator, or any other person, through the distribution of profits, payment of excessive charges or compensations or the more advantageous pursuit of their business or profession;"

250 ISKCON devotees. ISKCON claimed that the use of the property for book publishing and sales is required by the tenets of its religion and therefore the property should be exempt from tax under Murdock v. Pennsylvania, 319 U.S. 105 (1943).

The California Court of Appeal rejected this argument stating:

> "[ISKCON'S] book publishing and incense businesses were both intentionally profitable and were essentially commercial in nature. Both made sales to the general public as well as to temples of the movement and presumably competed with businesses not enjoying the welfare excemption. The fact that the Society's net income from these businesses was devoted apparently entirely to its religious purposes did not make these uses of its property exempt under Revenue and Taxation Code, section 214, subdivision (3), as rewritten in 1953. [Citations omitted.]
>
> . . .
>
> "A commercial profit-making use of otherwise exempt property by an organization qualifying for a particular property tax exemption destroys its right to the exemption by such use, notwithstanding the fact that the net proceeds of such use are applied exclusively to exempt purposes."

The Court of Appeal also stated by way of footnote:

"Such non-exempt commercial or business use of real property by an exempt taxpayer destroys its exemption partially but not completely. It eliminate from the exemption only that portion of the real property actually devoted to a nonexempt use. In this manner we look at both sides of the coin -- the taxpayers excempt purpose in the commercial or business use and the nonexempt manner it has chosen to accomplish that purpose." n. 10

Thus the California Court of Appeal has evidenced a sliding scale approach in determining what protections should be accorded to various activities of a religious sect in the area of taxation.

Although there is no question that entitlement to a real property tax exemption presents a different legal issue from that addressed in the area of Free Speech, the two are related herein that ISKCON asserts the religious ritual of Sankirtan as a complete bar to all governmental inference -- from booth regulations to property tax. This Court having agreed to address the issue of Sankirtan, now has the opportunity to formulate the determinative principles for validation of governmental acts. Therefore, the County of Los Angeles seeks by this brief to provide an analysis of Sankirtan as a multifaceted activity whose differing aspects may validly be subject to varying degrees of regulations in conformity with the differing levels of governmental interest in such regulation.

Within the factual framework of the instant case, this Court now may define more clearly

appropriate guidelines for the balancing process.

QUESTION PRESENTED

Whether all aspects of a series of inter-related activities conducted by a legitimately organized religious group may be protected from governmental regulation when the activities consistently include not merely proselytization distribution of literature, and solicitation of funds but also large-scale, deception, fraudulent conduct, and commercial sales transactions?

SUMMARY OF ARGUMENT

1. Commercial sales transactions which include habitual fraudulent conduct are not entitled to a high degree of First Amendment protection merely because the transactions are claimed to be a religious ritual.

2. As activities move from the realm of pure speech or pure belief to the realm of commercial and fraudulent transactions, the degree of governmental interest which must be shown to validate regulation should simultaneously decrease.

ARGUMENT

I

COMMERCIAL SALES TRANSACTIONS WHICH INCLUDE HABITUAL FRAUDULENT CONDUCT ARE NOT ENTITLED TO A HIGH DEGREE OF FIRST AMENDMENT PROTECTION MERELY BECAUSE THE TRANSACTIONS ARE CLAIMED TO BE A RELIGIOUS RITUAL.

In addressing this contention, it is helpful to review the seminal case Murdock v. Pennsylvania, 319 U.S. 105 (1943) since ISKCON has repeatedly sought to characterize its numerous constitutional challenges to local ordinances as a continuation of the pioneering First Amendment efforts of the Jehovah's Witnesses. Such an examination will pinpoint the fundamental differences between the Jehovah's Witnesses activities and those of ISKCON.

Murdock involved a challenge to a license tax imposed upon all persons who canvassed door to door in the City of Jeannette, Pennsylvania. Petitioners in Murdock were Witnesses who distributed religious literature and requested donations for it; the donations were characterized by the Court as sales. Nevertheless it struck down the taxing ordinance holding it to be an impermissible violation of petitioners' right to free exercise of their religion. The Court directly addressed the issue of the nature of the exchange and acknowledged:

". . . the problem of drawing the line between a purely commercial activity and a religious one will at times be difficult. On this record it plainly cannot be said that petitioners were engaged in a commercial rather than a religious venture. It is a distortion of the facts of record to describe their activities as the occupation of selling books and pamphlets." 319 U.S. 105, 111.

Further, the Court based its decision upon the absence of challenge to the integrity of the colporteurs. It stated:

"The integrity of this conduct or behavior as a religious practice has not been challenged. Nor do we have presented any question as to the sincerity of petitioners in their religious beliefs and practices, however misguided they may be thought to be. Moreover, we do not intimate or suggest in respecting their sincerity that any conduct can be made a religious rite and by the zeal of the practitioners swept into the First Amendment. Reynolds v. United States, 98 U.S. 145, 161, 167, 25 L.Ed. 244, and Davis v. Beason, 133 U.S. 333, 10 S.Ct. 299, 33 L.Ed. 637, denied any such claim to the practice of polygamy and bigamy. Other claims may well arise which deserve the same fate. We only hold that spreading one's religious beliefs or preaching the Gospel through distribution of religious

literature and through personal visitations is an age-old type of evangelism with as high a claim to constitutional protection as the more orthodox types. The manner in which it is practied at times gives rise to special problems with which the police power of the states is competent to deal. [Citations omitted.] But that merely illustrates that the rights with which we are dealing are not absolutes. Schneider v. State, 308 U.S. 147, 160, 161, 60 S.Ct. 146, 150, 84 L.Ed. 155. We are concerned, however, in these cases merely with one narrow issue. There is presented for decision no question whatsoever concerning punishment for any alleged unlawful acts during the solicitation."

The County of Los Angeles submits that the activities of ISKCON are not analogous to the proselytizing activities examined in Murdock. 3/

ISKCON argues that the religious ritual of Sankirtan insulates it from any taint of commerciality. ISKCON alleges that Snkirtan requires the pure devotees to approach the public, discuss with them the doctrines of Krishna and to sell books and other

---

3/ In this respect it should be noted that ISKCON in its Respondent's Brief in Opposition at p. 5 has noted that its challenges to state fair booth eregulations have involved indistinguishable facts. Thus the County of Los Angeles will address the various cases involving Sankirtan as comprising the same factual basis.

articles. Nevertheless, repeatedly, the reviewing courts have acknowledged that the devotees used fraudulent devices in order to sell their wares. Clearly, Murdock involved no fraudulent sales techniques. In contrast, ISKCON devotees consistently misrepresent their identity as well as the ultimate use to which donations will be put. They do so in order to more effectively elicit money from the public. Such deliberate fraudulent acts simply cannot be said to be a protected religious activity.

In fact, a recent decision has firmly ruled that the Sankirtan activities of ISKCON in selling its wares to the public, do not constitute the practice of a religious rite. In ISKCON v. Barber, 77 CV 328 (August 25, 1980 N.D.N.Y.), ISKCON sought to restrain administrators of the New York State Fair from enforcing "booth regulations" on the ground that requiring ISKCON to operate at the Fair from a booth as opposed to its practice of accosting persons in open areas pursuant to Sankirtan was a violation of free exercise rights guaranteed by the First Amendment. There too, ISKCON relied on Murdock. The court ruled that the regulations were valid and that the practice of Sankirtan was not a religious rite but rather a commercial activity. The Court gave a thorough treatment of the historical development of Sankirtan noting that although ISKCON claims its belief is centuries old, the organizational beginning in this country occurred in the 1960's. (Slip opinion p. 7.) The court noted that in its early development it was thought that religion should not be "aggressively proselytized throughout the general population" and that the more

religious Hindus did not practice Sankirtan nor was solicitation considered part of Sankirtan.

> "[Solicitation was rarely performed by the monks or the initiated faithful. Rather, this chore was shouldred by lay specialists who functioned as managers of the religion." (Id. 8.)
>
> "When approaching potential donors, these specialists were required to depend on 'true and gentle speech.' Moreover, they were immediately to identify their religious order and guru. Money could not be asked for directly, instead the specialist would ask only for a contribution of foods . . . or clothing. It was this fact that money was not asked for directly which separated those who were religious beggers from those who were not." (Id. 8-9.)

Nor could a prosepective doner be touched without permission. The traditional Sankirtan was a pure religious ritual set apart from solicitation of funds. The modern version of Sankirtan, however, has been expanded to include the solicitation of money. In fact the central theme of Sankirtan now is the collection of money from nonbelievers in order that they may be purged of their material possessions and thus become pure. In addition the court observed that it is unimportant to the Krishnas that nonbelievers understand the meaning of their donations or be involved in a religious discussion about Krishna. Purification comes directly from disengagement from material

possessions, that is money. Such methods as disguising a connection with ISKCON, shortchanging the public, misleading the public regarding the purpose of funds solicited were referenced by the Court in Barber and the record in ISKCON v. County of Los Angeles, 112 Cal. App. 3d 582 (1980) is replete with similar facts. Further, other lower court opinions have referred to the fraudulent conduct but, as stated, supra, have been limited by the factual stipulations which admitted the religious nature of Sankirtan without a trial on the merits as to this issue.

Perhaps the most significant aspect of Sankirtan noted by the Barber court in ruling it a commercial activity was succinctly stated:

> "One of the only things that the Kirshnas did not do at the State Fairs was to discuss their religion [with] fair goers. Despite the Krishna claims that Sankirtan is the means by which they spread the 'truth' of Krishna and gain converts, they did not appear to engage in any sort of religious discussion with the fair goers. At trial, each witness who was approached by the Krishnas and asked for money confirmed that the Krishnas made no mention of their religion at all. . . . This lack of knowledge can only be attributed to the fact that the Krishnas never explained their religious paraphernalia to the fair goers and rarely identified or explained their affiliation." (Slip opinion at 28-29.)

Finally, the Barber Court concluded:

"There is no question from the record in this case that the Krishnas are engaged in a widespread and systematic scheme of accosting, deceit, misrepresentation, and fraud on the public in their Sankirtan activities. The record shows patterns of deceptive practices identical in nature and practice throughout New York State, Massachusetts, and Maryland. Other cases involving the Krishnas have reported similar findings, though these courts did not delve into such incidents to the extent that was done in this case. (See Edward v. Maryland, No. 79-1545 (August 12, 1980) at p. 9 n. 2; ISKCON v. St. Fair of Tex. (N.D. Tex. 1978) 461 F.Supp. 719, 723-24.) Plaintiffs have made little, if any, attempt to control its members or to bring these incidents to a halt. Quite the contrary, the Krishnas have condoned such practices by using experienced 'thieves' to teach its newer members how to solicit money from the public in exactly the same way. Instead of removing individuals who are known to the Krishna Society as being repeat offenders or overly aggressive, the Krishnas have continued to accept the 'fruits' of such solicitation methods for its own commercial gain, all under the 'cloak' of being a religion." (Id. at 38-39.)

In ISKCON v. Kearnes, 454 F.Supp. 116 (E.D. Cal. 1978) the court addressed the issue of prior restraint on First Amendment activity. Although this case granted a preliminary injunction against the enforcement of a local ordinance requiring solicitors to obtain permits prior to engaging in solicitations, it must be noted that the injunction was granted at the pleading stage without a full trial on the merits. Even there, however, the court recognized "the problems created by fraudulent solicitations and the interest of the state in protecting its citizenry from their perpetration." In addition, the court delineated the problems prsented by prior restraint:

> "The problem of prediction is the key to the doctrine of prior restraint. . . . In most instances, however, one cannot know precisely what activity an individual will pursue. . . ."

The County of Los Angeles submits that within the framework of Sankirtan it has been demonstrated that devotees are counselled that use of deception is permissible because the object of Sankirtan is to separate materialistic individuals from their possessions by any means possible. See ISKCON v. Barber, supra, at 37-39. Fraudulent conduct can be predicted and, therefore, the problem posed by a prior restraint is diminished.

The courts look to whether a clear and present danger exists in order to support a prior restraint.

> "[T]he state must show a high probability that an individual is about to engage in proscribed speech, especially when the evil to be avoided is fraud, in order to support a system of prior restraint." ISKCON v. Kearnes, 454 F.Supp. 116 (E.D. Cal. 1978).

In Barber, the trial court had ample facts to demonstrate that fraud was going to be committed. Similarly in the instant case there were over 200 complaints concerning devotees' misconduct during the 1977 State Fair.

It is peculiarly ironic to note ISKCON'S position in this case in comparison with, for example, Jehovah's Witnesses. The latter group sought freedom to express particular ideas which other members of society might not approve - nevertheless the thrust was in the direction of communication of their message. In contrast, it is the practice of ISKCON'S devotees to deceive the public as to their religious affiliation. As pointed out in Barber it is not necessary for the uninitiated to know or understand the tenets of ISKCON, the mere removal of material possessions accomplishes purification. Thus, ISKCON seeks to bring non-communication within the ambit of the First Amendment.

There is no reason to protect such activity at all much less to accord it the highly protected status sought here by ISKCON.

II

AS ACTIVITIES MOVE FROM THE REALM OF PURE SPEECH OR PURE BELIEF TO THE REALM OF COMMERCIAL AND FRAUDULENT TRANSACTIONS, THE DEGREE OF GOVERNMENTAL INTEREST WHICH MUST BE SHOWN TO VALIDATE THE REGULATION SHOULD SIMULTANEOUSLY DECREASE.

As has been recognized explicitly in the dissent below and implicitly in Barber, the solution to the problem of regulation of First Amendment activities where they comprise various aspects is to recognize that threshold issue that the various aspects are entitled to various degrees of protection. The Todd dissent below which was subscribed by Chief Justice Sheran and Justice Scott considered Sankirtan as several different activities: distribution, solicitation, sale and collection of funds. ISKCON v. Heffron, 299 N.W.2d 79, 86 (1980) (Todd, J. dissenting). This approach allows for a balanced analysis of the showing of a governmental interest that must be made. Clearly, the state may not validly restrict ISKCON'S devotees' rights to preach their religion to others, nor to distribute literature. However, as to sales and collection of funds particularly under the circumstances described above, the interest of the state moves to tip the balance of the scale in favor of regulation. For example, in ISKCON v. Eaves, 601 F.2d 809 (5th Cir. 1979), this principle was examined. There the ISKCON devotees were required not to

accept proffered money during the practice of Sankirtan but rather to refer prospective donors to a solicitation booth. The court observed:

> "Under the terms of the ordinance, appellants can ask for funds or attempt to sell religious tracts at any place in the airport where they are allowed to proselytize; the ordinance requires only that instead of accepting any proffered money, they refer the donor to a solicitation booth. We do not doubt that this is burdensome and that appellants lose money as a result. But there is little in this record to reveal the extent of the loss, and it is not obvious that the loss would be very great. Atlanta's interest in confining transfers of money to the booths is better documented."

There too the state justified its regulation on the ground that it applied to mechanical non-communicative aspect of transferring money. The Court went on to hold that "the regulated transfers of money [are] the medium, not the message," and that Atlanta demonstrated that the interest it had in the regulation was substantial and the regulation itself reasonable. See Grayned v. City of Rochford, 408 U.S. 104 (1972); Schneider v. State, 308 U.S. 147 (1939).

Other Courts in ruling on similar issues raised by ISKCON'S barrage of litigation challenging state fair booth regulations have demonstrated a sensitivity to the balancing question.

ISKCON v. Conlisk, 374 F.Supp. 1010, 1015 (E.D. Ill. 1973) citing United States v. O'Brien, 391 U.S. 367, 376 (1968), recognized that when speech and non-speech elements are combined, an important governmental interest in regulating the non-speech element can justify incidental restrictions on First Amendment rights.

CONCLUSION

The County of Los Angeles supports the position of the Attorney General of Minnesota that the ruling of the Supreme Court of Minnesota in ISKCON v. Heffron should be reversed because there is no reason to accord First Amendment protection to commercial transactions involving fraud simply because they are claimed to be part of a religious ritual. The seminal case of Murdock v. Pennsylvania, 319 U.S. 105 (1939) warned against precisely this development. Not every activity may be swept into the First Amendment under the cloak of religion. Further, a rational balancing requires that as to the commercial aspects of a claimed religious activity, the state's burden to show a substantial interest in regulating the activity should diminish.

Respectfully submitted,

JOHN H. LARSON
County Counsel

DeWitt W. Clinton
Chief, Division of Special Services

MARY F. WAWRO
Deputy County Counsel

Amicus Curiae
County of Los Angeles